

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:22-cv-24066-KMM

GRACE, INC., et al.,

Plaintiffs,

-vs-

CITY OF MIAMI,

Defendant.

DEPOSITION OF: CAROLYN DELORES DONALDSON

DATE: Monday, October 9, 2023

TIME: 1:00 p.m. - 4:30 p.m.

PLACE: GRAY ROBINSON, P.A.

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Miami, Florida 33131

STENOGRAPHICALLY

REPORTED BY: VANESSA OBAS, RPR

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APPEARING ON BEHALF OF THE DEFENDANT

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S T I P U L A T I O N S

It is hereby stipulated and agreed by and between the counsel for the respective parties and the deponent that the reading and signing of the deposition transcript be reserved.

P R O C E E D I N G S

THE COURT REPORTER: Please raise your right hand.

Do you solemnly swear or affirm that the testimony you're about to give in this cause is the truth, the whole truth, and nothing but the truth?

THE WITNESS: I do.

THEREUPON

CAROLYN DELORES DONALDSON

was called as a witness and, having first been duly sworn, testified as follows:

THE COURT REPORTER: Thank you.

DIRECT EXAMINATION

BY MR. LEVESQUE:

Q. Good afternoon, Ms. Donaldson. My name is George Levesque. I represent GrayRobinson and -- I'm sorry. I'm with GrayRobinson and I represent the City of Miami.

MR. LEVESQUE: Before we go on, I'll ask if counsel present can identify themselves.

MR. MERKEN: Good afternoon. Christopher Merken, from Dechert LLP, on behalf of Ms. Donaldson and the plaintiffs.

MS. MCNAMARA: Caroline McNamara from the ACLU

1 of Florida on behalf of Ms. Donaldson and the
2 plaintiffs.

3 BY MR. LEVESQUE:

4 Q. Can you please state your full name for the
5 record.

6 A. Carolyn Donaldson.

7 Q. And do you have a middle name?

8 A. Delores.

9 Q. And have you ever been deposed before?

10 A. Yes.

11 Q. Okay. How many times?

12 A. Gosh. Probably three or four.

13 Q. Three or four?

14 Okay. And what were those depositions -- what
15 was involved with those depositions? What was going on?

16 A. I was executive vice president for human
17 resources in both the medical device sector and the
18 pharmaceutical sector. So I was on behalf of the
19 organization.

20 Q. Okay. And were those depositions connected
21 with HR issues?

22 A. HR. Employee-related matters, yeah.

23 Q. Okay. Well, since you do have some experience,
24 I'll still go over some of the ground rules, but it's
25 probably going to sound pretty similar to what they did

1 before.

2 Obviously, this is an oral conversation that
3 we're having. Everything that we're saying is being
4 transcribed by the court reporter. I tend to talk
5 softly and lowly, so I'm going to try to talk slower and
6 loud -- more loud so you can hear me. If you could do
7 the same.

8 At different times, particularly in a normal
9 conversation, you might understand where I'm going and
10 you might start to answer my question even before I get
11 there. What I'd ask is, to make it easier for the court
12 reporter, to take down two people that are talking at
13 the same time, it gets really challenging. When three
14 people get going, it's near impossible. So let me
15 finish my question, and then you can answer the
16 question.

17 At different times, as we're sitting in a
18 normal conversation, headshakes, head nods, those types
19 of things, you'll understand -- I understand what you
20 mean, but for taking down a transcription, head nods and
21 headshakes are a little more difficult to transcribe.

22 So I might at different times say, "Is that a
23 'yes'?" I'm not doing it to be rude. I'm doing it to
24 make sure that we have a good transcription of our
25 conversation so there's no ambiguity as to -- if I asked

1 you a yes-or-no question and you said, "Yes," you've got
2 a "yes" on the record. And I think that helps you and
3 helps me as well.

4 At different times your counsel may object.
5 Let him go ahead, get his objection out, and then I
6 might ask you -- unless he instructs you not to answer,
7 I might ask you to go ahead and answer the question, or
8 I might have a colloquy with your counsel. If that's
9 the case, you know, we'll kind of figure out how things
10 go. But the big thing is if he starts to object, kind
11 of let him get his objection on the record, and then
12 we'll kind of take it from there.

13 Are you on any medication that would impair
14 your ability to testify truthfully today?

15 A. No.

16 Q. Are you on any medication that would impair
17 your memory?

18 A. Age.

19 Q. Age?

20 A. No.

21 Q. I wish I could stop taking that medication.

22 And if I understand correctly, you are here as
23 the corporate representative for the South Dade branch
24 of the NAACP; is that correct?

25 A. Yes.

1 (Defendant's Exhibit Number 1, Notice, was
2 marked for Identification.)

3 MR. LEVESQUE: Okay. We are going to mark this
4 as Defendant's Exhibit 1.

5 MR. MERKEN: Thank you.

6 BY MR. LEVESQUE:

7 Q. And have you seen this document before,
8 Ms. Donaldson?

9 A. Yes.

10 Q. And on page 4, there's a list of topics.

11 Have you reviewed those topics before today?

12 A. Yes, I have.

13 Q. Okay. And let me ask this: What have you done
14 to prepare for your deposition today?

15 A. I went through the questions, went through my
16 personal notes, and spoke to several other individuals
17 at the NAACP that I thought might have a better
18 understanding of a question than I might have.

19 Q. Okay. And who are the other individuals at the
20 NAACP that you spoke with?

21 A. Harold Ford, Brad Brown, and Merline Malcolm.

22 Q. And that's Merline Malcolm?

23 A. Merline, M-E-R-L-I-N-E. Malcolm,
24 M-A-L-C-O-L-M.

25 Q. And I apologize. What was Brad's last name?

1 A. Brown.

2 Q. Brown.

3 Other than Mr. Ford, Mr. Brown, and
4 Ms. Malcolm, is there anybody else that you spoke with?

5 A. At the NAACP?

6 Q. Yes, ma'am.

7 A. No. I -- I sent a general text message asking
8 questions, but I didn't speak -- actually speak to
9 anyone else.

10 Q. Okay. The general text message asking
11 questions, who did you send that to?

12 A. The same three people.

13 Q. Okay.

14 A. Uh-huh.

15 Q. Did you text or e-mail with anyone other than
16 those three people about your deposition today?

17 A. At the NAACP or outside of the NAACP?

18 Q. We'll start with the NAACP.

19 A. NAACP, no. No one else at the NAACP.

20 Q. Okay. Other than attorneys, have you had
21 communications about your deposition today with anyone
22 that is not a part of the NAACP?

23 A. The GRACE board.

24 Q. Okay. And who are the members of the GRACE
25 board?

1 A. That, I -- you mean the names of each person
2 that's on the GRACE board?

3 Q. Yes, ma'am.

4 A. Reynold Martin, Anthony Alfieri, Clarice
5 Cooper, John Chambers, Bernard Phanord, Chris Hudson,
6 and Reverend Robinson. I think that's everybody.

7 Q. And I'm sorry. I was writing furiously, but
8 Bernard -- what was Bernard's last name?

9 A. Phanord, P-H-A-N-O-R-D.

10 And Reverend Nathaniel Robinson. Is that seven
11 people?

12 Q. Yes, ma'am.

13 A. Okay.

14 Q. And you make up the eighth member of the board?

15 A. Yes.

16 Q. Okay. And what is -- you referenced the GRACE
17 board. What is GRACE?

18 A. GRACE is a member-based organization in Coconut
19 Grove.

20 Q. And are its members made up of individuals and
21 organizations?

22 A. Yes.

23 Q. And how many individual members does it have?

24 A. I don't recall.

25 Q. Do they keep a membership list?

1 A. There's a comprehensive list of organizations.

2 Q. What are the type of organizations that are
3 members of GRACE?

4 A. Churches, nonprofits, civic.

5 Q. The nonprofit organizations, that could
6 encompass a large variety of nonprofit organizations.
7 What are -- what are a sampling of the types of
8 nonprofit organizations that are GRACE's members?

9 A. Coconut Grove Negro Women's Club.

10 Q. What else?

11 A. Ministerial Alliance.

12 Q. Is the ACLU a member of the organization?

13 A. No.

14 Q. Did you review any documents in preparation for
15 your deposition?

16 A. I reviewed my files.

17 Q. And I think you mentioned you reviewed your
18 personal notes. Can you describe your personal notes.

19 A. It would be notes that I may have taken in --
20 corresponding to meetings that I may have participated
21 in. Documents that I may have read over time.

22 Q. Have you shared these notes with anyone?

23 A. No. No one, no.

24 Q. And you mentioned that you've taken notes that
25 may be corresponding with meetings that you participated

1 in.

2 What are some of the types of meetings that you
3 participated in related to this litigation?

4 A. With the NAACP, at the start of the discussions
5 around redistricting, I was the housing chair at that
6 time for the NAACP. And so I made notes in informing
7 them of the fact that we had become aware of a
8 redistricting concern with the City of Miami for the
9 South Dade branch.

10 Q. Do you recall approximately what time or when
11 on the calendar that might have been?

12 A. Late December or early January of 2022.
13 Probably early January of 2022 because I -- I don't
14 recall, but I may have become aware of the redistricting
15 concern December of 2021.

16 Q. So the time period -- just so I'm clear --
17 would be December 2021 or January 2022?

18 A. '2, yes.

19 Q. And what was the concern about housing that
20 came to your attention with redistricting?

21 A. Well, it wasn't a concern about housing per se.
22 As the housing chair representing also Coconut Grove, as
23 a part of my update to the executive committee, I
24 mentioned that a -- that we had met at city hall and
25 became aware of a redistricting concern. So it was part

1 of my standard housing chair update report.

2 Q. Okay.

3 A. Because it was an incident in Coconut Grove.

4 Q. And you were a member -- you were the housing
5 chair for the South Dade branch of the NAACP; correct?

6 A. Yes.

7 Q. Did you have any role or title with GRACE at
8 that time?

9 A. Yes. Vice-chair for GRACE.

10 Q. So when you were talking about updating the
11 executive committee, you were referring to the executive
12 committee for the South Dade NAACP?

13 A. For the South Dade NAACP, yes.

14 Q. Did you provide any updates or provide similar
15 feedback or reporting to GRACE at any time?

16 A. Yes, I did.

17 Q. Okay. And that would have been -- been
18 provided back to the seven other GRACE board members;
19 correct?

20 A. It would have been?

21 Q. Provided to the seven other GRACE board
22 members?

23 A. Yes.

24 Q. Were there other members in GRACE that you
25 provided those updates to?

1 A. Primarily, the GRACE board members.

2 Q. Ms. Donaldson, where were you born?

3 A. Cairo, Georgia.

4 Q. Cairo?

5 I'm from Tallahassee.

6 A. Oh.

7 Q. My mom's from Moultrie. So I'm familiar with
8 the area.

9 A. Okay.

10 Q. And when did you move to Miami?

11 A. 1955.

12 Q. I think that's long enough to consider yourself
13 a native.

14 A. Yes. I just celebrated 70 years, so --

15 Q. Congratulations. I hope I age half as well as
16 you and Ms. Cooper. Right now I'm not off to a good
17 start.

18 Have you lived here continuously since 1955?

19 A. I consider it continuously, but I have to
20 define that because working in pharmaceuticals and
21 medical devices, we travel quite a bit. So I never gave
22 up my home here even though I had residence in other
23 cities throughout that time.

24 Q. Understood.

25 Miami was always your primary residence?

1 A. Miami -- always.

2 Q. And have you been a registered voter since
3 moving down?

4 A. 17 years old.

5 Q. And where do you presently live?

6 A. In Miami Lakes.

7 Q. And what city district is that in?

8 A. Miami Lakes is Miami Lakes. It's incorporated.

9 Q. Okay. So it's not actually within the city
10 limits?

11 A. No, it's not within the city limits.

12 Q. Okay. So you're not a resident of the city?

13 A. Not of the city of Miami, no.

14 Q. Now, for the NAACP, do they keep a list of
15 their members?

16 A. Only at national.

17 Q. Only at national?

18 A. Uh-huh.

19 Q. Do you know if anybody that is a part of the
20 South Dade-Miami NAACP chapter, do you know if anybody
21 from that part of the organization did an analysis to
22 figure out where some of its members live, whether they
23 live in District 2, 4, 3, or any of the other districts?

24 A. Not to my knowledge.

25 Q. And as the corporate representative, can you

1 tell me which districts your members reside in, in terms
2 of the city of Miami?

3 A. The South Dade chapter's memberships start at
4 Flagler Street and areas south of Flagler Street, which
5 would encompass Districts 2, 3, and 4 of Miami.

6 Q. So you don't have any members, to the best of
7 your knowledge, in District 5?

8 A. Not unless they've moved.

9 Q. And to the best of your knowledge, would it be
10 the same answer for District 1?

11 A. Yes.

12 Q. And what is the mission of the South Dade
13 NAACP?

14 A. Our primary mission is really ensuring that --
15 that individuals -- we look at really their rights
16 within the city, making certain that there are no levels
17 of discrimination that they are experiencing, and, if
18 so, how we might be able to lend assistance to them in
19 those areas. And that could be Blacks or any
20 individuals of color.

21 Q. And when you say "Blacks or any individuals of
22 color," would that also include --

23 A. Because we have a lot of islanders --

24 Q. Okay.

25 A. -- that distinguish themselves different from

1 Black Americans.

2 Q. Understood. Thank you for that clarification.

3 Would it also include Hispanics?

4 A. It could.

5 Q. And would that be a Hispanic that identifies as
6 both Hispanic and islander or Hispanic and Black?

7 A. They -- they could.

8 Q. Okay.

9 A. We have individuals that take on two, three
10 designations. So we don't discriminate against them.
11 If they tell us whatever category they're -- they are
12 qualifying by, it's accepted by us.

13 Q. And what is the type of assistance that you
14 provide?

15 A. In my case, I primarily looked at housing
16 discrimination that may have taken place; i.e., a person
17 couldn't rent a place because of their color or they
18 felt that they were being disproportionately targeted in
19 a particular community, things along those lines. They
20 would bring those types of issues.

21 Q. Outside of the housing context, what are the
22 other types of assistance that the NAACP --

23 A. It could have been --

24 Q. -- South Dade chapter would provide?

25 A. South Dade, it could have been age, gender --

1 any form of a disability they -- that they may have had.
2 All of the major categories that you would typically see
3 lines of discrimination that might occur.

4 Q. Okay. And I appreciate the breadth of the
5 problems that you're attempting to address. What I'm
6 trying to drill more down on is what is the assistance
7 that's being provided? Are you making phone calls to
8 landlords? Are you hiring attorneys? Are you providing
9 other types of social services to facilitate them in
10 their time of need? I guess, what does --

11 A. And it is -- and it is all of the above. It's
12 all of the above because we have at least 13 different
13 community -- committees that address all of the various
14 issues that a person might realize living here in South
15 Florida, because other markets can be different. And we
16 look to address their concerns. And people bring all
17 sorts of concerns to us.

18 Q. You mentioned 13 different committees. Are
19 those 13 different committees within the South Dade
20 NAACP?

21 A. The 13 committees are within the NAACP. Right
22 offhand, I could think of four or five, but I know that
23 we have a lot more than that within the chapter.

24 Q. Okay.

25 A. That gets addressed by individuals, whether

1 legal concerns, individuals getting out of jail and
2 making transition. There is a group that works with
3 them.

4 Veterans. There's a group that works with
5 veterans, and the veterans are split because female
6 veterans have experienced some other challenges that are
7 different. So then we have our women's network that
8 deals with battered women and their particular concerns.

9 Discrimination within employer --
10 employer-related discrimination, and that can fall into
11 a whole host of categories that a person might -- might
12 experience.

13 Q. You mentioned that the assistance that's
14 provided could, like, be all of the above. Does the
15 NAACP have attorneys that would provide those services,
16 or would you hire an attorney or would you refer a
17 person to an attorney?

18 A. Well, we're all volunteers, and we do have an
19 attorney on staff that's a volunteer. National has a
20 legal group that we can refer legal issues to.

21 Q. And I'm probably getting ahead of myself here.
22 Can you describe for me the relationship that the South
23 Dade NAACP has to the national organization.

24 A. The relationship?

25 Q. Yes, ma'am.

1 A. We're a chartered chapter. And, actually,
2 rechartered chapter because previously all of Miami-Dade
3 County was chartered and combined. And in 2019, South
4 Dade rechartered with national. And that's splitting
5 the county up.

6 Q. Okay. And is the South Dade NAACP a separate
7 legal entity from the national chapter -- or the
8 national organization?

9 A. I don't know, legally. Yeah. I mean, when you
10 say "a separate legal entity" -- I don't know. I don't
11 know. I can't really answer. I can't really answer
12 that question. I just know that we are a chapter under
13 the national organization representing South Dade, which
14 are residents south of -- south of Flagler, and we have
15 a North Dade branch.

16 Q. And how does one become chartered as a chapter
17 for the NAACP -- the national organization?

18 A. Well, there's -- well, I'm sure there was
19 extensive paperwork that needed to be filed. I was not
20 a part of the team that worked on getting the chapter
21 chartered.

22 Q. Okay. Did you speak to anyone about how a
23 chapter becomes chartered under the national
24 organization?

25 A. No. No. I don't think I answered that

1 specific question: "How did we become chartered?"

2 Q. If you wanted to talk to somebody about how you
3 became chartered, who would you call?

4 A. Brad.

5 Q. Brad?

6 What did you talk to Brad about?

7 A. Well, I talk to Brad often. I mean, I talk to
8 Brad often. You mean what? Within recent weeks or --

9 Q. In preparation for your deposition today --

10 A. Oh, in preparation for the deposition today? I
11 talked to Brad just to review different actions that we
12 had taken as a chapter. Basically, verifying my notes
13 to what would have been my conversations with him and
14 action steps that we took to confirm that nothing else
15 took place outside of the things that I had referenced
16 to them as a chapter, since I was the primary conduit on
17 this matter.

18 Q. And you also spoke with Mr. Ford in preparation
19 for your deposition this morning?

20 A. Yes. I spoke to Harold, uh-huh.

21 Q. Okay. And what --

22 A. He's the new president.

23 Q. And what did you speak to Mr. Ford about?

24 A. Confirming -- I knew he had attended one -- at
25 least one hearing and -- I was just confirming his

1 actions, really, because he's newer to the process.

2 And -- let me see. Did I talk to Harold about anything
3 else?

4 Oh, and the fact that -- I'm sorry. I forgot
5 about that one. The fact that they had asked if I would
6 be the representative.

7 Q. Okay.

8 A. Because normally it would be the president.

9 Q. And what did you speak with Ms. Malcolm about
10 in preparation for your deposition as the corporate
11 representative?

12 A. Oh, I spoke to Merline because I was trying to
13 confirm where we might have members located within
14 various districts.

15 Q. And do you know if she looked at a list to try
16 to identify where various members might be located?

17 A. The information's not available to us. It's
18 only at a national level.

19 Q. Do you know if anyone contacted the national
20 organization to try to assess whether your members live
21 in Districts 2, 3, and 4 and if they might also reside
22 in Districts 1 or 5?

23 A. Her feedback to me was that national said that
24 information is not available.

25 Q. Okay.

1 A. Membership information is confidential.

2 Q. If one was looking to verify where your members
3 live, is there any way to do that?

4 A. Not really. Unless you personally know someone
5 living within a particular district. Like, in my case,
6 I do know of people that live in District 2.

7 Q. Okay.

8 A. Because I spent quite a bit of time in
9 District 2. And possibly of a couple of people in
10 District 4.

11 Q. And you say "possibly in District 4." Why
12 "possibly" versus "I know they live in District 4"?

13 A. Because I don't always know where people live.
14 So as we sometimes make assumptions that a person lives
15 in a particular area.

16 Q. Okay. Do you know for certainty any people
17 that live in District 3?

18 A. Not for certain.

19 Q. Okay. And what about for certain for
20 District 4?

21 A. Unless they moved.

22 Q. When was the last time you had contact with
23 them?

24 A. It's -- it's been a -- it's been a while. It's
25 been a while.

1 Q. Okay. For comparison, "a while" might mean
2 different things to different people. If I tell my son,
3 "It's going to be a while," he's 14, that could be five
4 minutes or it could be two days.

5 A. Okay.

6 Q. So --

7 A. I want to say early 2023.

8 Q. Okay. So this year?

9 A. This year.

10 Q. Okay.

11 A. Yeah, this year.

12 Q. Now, you mentioned that the South Dade chapter
13 rechartered in 2019. Do you know why they rechartered?

14 A. Yes. We had a lot of discussion about the
15 distance between membership, which goes down as far as
16 the Upper Keys, and trying to get to membership meetings
17 in North Dade. Traffic patterns. People's work
18 schedules. Just a whole host of things that made it
19 quite difficult to accommodate the members in South
20 Dade.

21 Q. And so prior to 2019, if I understood
22 correctly -- well, let me back up.

23 Prior to 2019, for the Miami-Dade chapter of
24 NAACP, where were those meetings held?

25 A. Various locations. Miami Gardens, Liberty

1 City, Overtown. They were north.

2 Q. Were there any meetings that were held in the
3 south part of Miami Dade?

4 A. Not that I recall.

5 Q. Would it be fair to say, then, that the
6 rechartering of the South Dade chapter was really
7 intended to address the geographic difficulties of
8 having an organization that is sort of focused in the
9 north for people who want to participate but are living
10 in the south part of the county?

11 A. Yes, I would say that.

12 Q. Were there any other reasons that factored into
13 the decision to recharter in 2019?

14 A. The issues in South Dade actually are quite
15 different than the issues in North Dade.

16 Q. And how are those issues different?

17 A. The types of housing concerns in North versus
18 South Dade are different. The access to resources in
19 North Dade are more readily available than they are in
20 South Dade. That would be two key ones that I can think
21 of just because of logistically where they're located.
22 They have access to resources that the South Dade
23 population doesn't necessarily have access to.

24 Q. When you talk about access to resources, what
25 type of resources are you talking about?

1 A. Okay. I'll just give an example of one because
2 I had responsibility for housing. Housing For All, the
3 organization, which is a nonprofit, is located in North
4 Dade. Individuals in South Dade would have to travel up
5 to North Dade to have access to those resources.

6 Q. And I guess -- does Housing For All provide
7 housing?

8 A. I don't think they provide housing. I think
9 they network in order to know where available housing
10 is. Provide -- when you say "provide," it sounds to me
11 like you're saying they build the housing. They --

12 Q. Well, maybe -- let me kind of let you know
13 where I'm confused.

14 I'm trying to figure out if somebody in South
15 Dade needs to go up to North Dade to meet with Housing
16 For All, what are they hoping to get out of it?

17 A. Referrals. References. Data. Assistance.

18 Q. Housing For All doesn't maintain an office or a
19 presence in South Dade?

20 A. They didn't previously. I don't know about
21 today, but they didn't previously. But I'm not that
22 familiar with them as an organization to say what they
23 do or don't offer at this point in time. But previously
24 they didn't. And transportation is a key issue from
25 South Dade. Metrorail stops at Dadeland.

1 Q. So would transportation -- public
2 transportation be another issue?

3 A. Public transportation. Three to four buses on
4 a full day. They get access. This is a huge issue.

5 Q. And so that would be another example of
6 resources that's more readily available in North Dade
7 than it is in South Dade?

8 A. Absolutely.

9 Q. So what I'm going to call -- and you can let me
10 know if it's a fair characterization.

11 Support-type services for finding housing and
12 public transportation are two of those resources that
13 are more readily available in North Dade than they are
14 in South Dade; is that fair?

15 A. Yeah, I would say that's fair. Uh-huh.

16 Q. Other than those two, are there other types of
17 resources that are more readily available in North Dade
18 than they are in South Dade?

19 A. Probably. I'm not the expert on everything
20 that's -- is and isn't available. I just gave those
21 two. It's where I've been able to provide assistance to
22 people.

23 Q. Are you currently employed?

24 A. I'm retired.

25 Q. And when did you retire?

1 A. The first time, in 2006. And then again in
2 2012.

3 Q. Okay. The first time, in 2006, what did you
4 retire from?

5 A. From a pharmaceutical company. Noven
6 Pharmaceuticals.

7 Q. I'm sorry. Was that Novid?

8 A. Noven. Noven, N-O-V-E-N.

9 Q. And in 2012, where did you retire from?

10 A. From Altegra Health, A-L-T-E-G-R-A. Altegra
11 Health.

12 Q. And what did you do for Altegra Health?

13 A. Revenue cycle management.

14 Q. And after you left Noven Pharmaceuticals
15 in 2006, how long did you stay retired?

16 A. For about -- I've never felt retired. So it's
17 relative. But -- but I did retire. So you're asking
18 what did I do?

19 Q. Well, what I'm asking -- well, maybe a better
20 way to ask it is -- okay. You stopped working at Noven.
21 How long did you -- how long were you -- were you
22 unemployed, or how long before you jumped on with
23 Altegra?

24 A. I was consulting when I left Noven.

25 Q. Okay. And did you actually go in-house with

1 Altegra, or did you maintain your consultant status?

2 A. I started as a consultant with Altegra and then
3 I became staff. And revenue cycle management, our goal
4 was to buy and sell companies and create a new revenue
5 cycle management company. And once that was done, I
6 left. Even though I had become full-time, I decided I
7 didn't want to work. I wanted to be retired.

8 Q. Okay. And I'm certainly not suggesting that
9 since you retired you're not busy and active and doing
10 lots of different things.

11 From an income-generating standpoint, are you
12 currently employed anywhere or have you been employed
13 anywhere since 2012?

14 A. No, other than to take one-off consulting
15 assignments.

16 Q. Okay.

17 A. Which I don't even do that now because I have
18 arthritis.

19 Q. Okay. Do you collect a salary or anything from
20 the NAACP?

21 A. No.

22 Q. Do you collect a salary from GRACE?

23 A. No.

24 Q. Do you collect a salary from any organization?

25 A. No. All volunteer. 80 hours a week.

1 Q. Like I said, I'm not suggesting you slowed down
2 at all.

3 A. Because I also have my church. I help them
4 40 hours there.

5 Q. How did you first become aware of this
6 litigation?

7 A. I was at a commission meeting, and there was
8 discussion of actions that were going to need to be
9 taken as a result of the 2020 census.

10 Q. Do you recall when that commission meeting was?

11 A. Late 2021.

12 Q. Do you recall if that would have been in the
13 November 2021 time frame or the December 2021 time
14 frame?

15 A. I don't -- I don't exactly, but there was
16 conversation about -- around that time frame.
17 November/December time frame.

18 Q. Okay. What do you recall being shared at that
19 commission meeting?

20 A. Results of the -- that based on the findings,
21 District 2 had too many residents and they would need to
22 be evened out across the various districts.

23 Q. And --

24 A. Or dispersed or however they were going to
25 handle it.

1 Q. Geographically, in terms of District 2's
2 situation in relation to the rest of the districts,
3 where is District 2 located?

4 A. On the east side of the city.

5 Q. Is it primarily a coastal district?

6 A. Coastal, yep.

7 Q. Would it be a fair characterization to describe
8 it as the coastal district for the city?

9 A. You could.

10 Q. And I understand it's not the only district
11 that touches the coast, but --

12 A. Correct.

13 Q. What's your understanding of how overpopulated
14 District 2 was?

15 A. I don't know specific -- I don't recall
16 specific numbers, even though I do remember numbers
17 being mentioned. But I know it was overpopulated.

18 Q. And what was your understanding of what the
19 City needed to do to fix that overpopulation?

20 A. Adjust the numbers within District 2 so that
21 they were more even -- evenly dispersed.

22 Q. And how would they go about adjusting those
23 numbers? And I'm not meaning these to be sort of trick
24 questions. I just want to make sure, you know, we're
25 sort of locking down -- some of these might be obvious

1 things that you're wondering, "Why is he asking me
2 that?" But it's just mostly for the record.

3 So if they needed to adjust the numbers, how do
4 they adjust the numbers for District 2?

5 A. I don't know how they specifically needed to
6 adjust the numbers, but generally to adjust numbers, you
7 need to put some bodies into other districts.

8 Q. And so the numbers that we're talking about --
9 the numbers are actually people --

10 A. People.

11 Q. -- that live in District 2?

12 A. People that live in District 2 needed to be
13 dispersed into other districts until the five districts
14 were more evenly distributed.

15 Q. And they would do that by moving the district
16 lines to move people that were in District 2 into a
17 nearby district; correct?

18 A. Move district -- that could be a way of
19 characterizing it, yes.

20 Q. Okay. It's fair to say that they're not
21 forcibly busing people from District 2 to District 4?

22 A. Exactly, yes. Yes.

23 Q. And I think you indicated, if I'm correct, that
24 you've resided in Miami-Dade since 1997 -- I'm sorry,
25 since 1955?

1 A. Yes.

2 Q. Have you ever lived within the city limits?

3 A. Yes.

4 Q. Okay. When did you live within the city
5 limits?

6 A. Until 1973.

7 Q. And after 1973, did you live in the
8 unincorporated parts of Miami-Dade?

9 A. And then I lived in unincorporated Miami-Dade.

10 Q. And that's been the case ever since '73?

11 A. Yes.

12 Q. Are you familiar with the effort in the
13 1996/'97 time frame where the city transitioned from
14 citywide districts to segmented city districts?

15 A. Define -- I'm not sure what you mean by
16 "citywide districts."

17 Q. A commissioner was elected citywide. They
18 didn't represent a particular geographic area within the
19 city. They -- everybody in the city voted on all of the
20 commissioners that would have been up for election at a
21 particular point in time.

22 A. Yes, I do remember that.

23 Q. Okay. Were you involved in that effort in any
24 way?

25 A. No.

1 (Defendant's Exhibit Number 24-83, 2022 Enacted
2 Plan, was marked for Identification.)

3 BY MR. LEVESQUE:

4 Q. Ms. Donaldson, I am going to show you what
5 we're going to mark as Defendant's Exhibit 24-83.

6 And I will stop talking for a moment.

7 And I'll represent to you that that is the 2022
8 enacted plan. The plan that the city commission passed
9 in March 2022.

10 Do you recognize that document?

11 A. Yes.

12 Q. And on behalf of the South Dade NAACP, what
13 were their concerns with how this map was drawn?

14 A. Well, the way this map was drawn would indicate
15 that the area that we call "West Grove" or the "Little
16 Bahamas of Coconut Grove" would be split into several
17 fractions.

18 Q. And the area of the West Grove you're talking
19 about, is that that little triangle right there?

20 A. The West Grove could come out a little further
21 than that, but it's inclusive of that, yes.

22 Q. And when you say "could come out a little bit
23 further of that," you mean on the other side of US 1 and
24 the railroad tracks there to encompass that area?

25 A. Not on the other side of US 1.

1 Q. Okay.

2 A. No.

3 Q. All right. So when you say "the other side" --

4 A. Where the cone is. Coming into The Grove area.

5 Q. Can you --

6 A. But if -- I don't know. Do you have one that
7 has streets?

8 Q. I don't. Because trying to do that for city --
9 city geography, it gets kind of cumbersome.

10 A. Okay.

11 Q. If I could ask if you could use the blue pen
12 and circle the area that you're talking about.

13 A. Without streets, I would hate to circle an
14 area.

15 Q. Okay.

16 A. But if I see streets --

17 Q. Okay.

18 A. I grew up in The Grove.

19 Q. Okay.

20 A. So when I see streets, I know what's considered
21 The Grove for purposes of the Little Bahamas or West
22 Grove.

23 Q. Okay. Well, let me suggest this.

24 If I can reference that this is US 1 right
25 here.

1 A. Oh, yeah. I know that's US 1.

2 Q. So is anything that would be on the pink side
3 of US 1 considered part of The Grove, in your mind?

4 A. Not for a very long time.

5 Q. Okay.

6 A. So not for a long time. It would be when I was
7 a kid.

8 Q. Okay. So then it's fair to say that at least
9 the part of The Grove that you're referencing being
10 included in District 4 that was of primary concern was
11 in that little triangle?

12 A. Correct. It's in that little triangle, yes.
13 That's a part of District 4, yes.

14 Q. And so that's the part of District 4 that
15 breaks the US 1 boundary and goes down into District --
16 what used to be District 2, that they're grabbing that
17 population and putting it in District 4; is that
18 correct?

19 A. That's correct.

20 Q. And can you circle that area that we're talking
21 about for clarity on your --

22 A. You mean here?

23 Q. Yes, ma'am.

24 Now, are there other objections that the South
25 Dade NAACP had to this plan?

1 A. District 3, when you come to the -- see, you
2 still don't have streets. We don't have streets here,
3 but when we looked at this with streets there,
4 District 3 came down across Bird Road, which also -- you
5 have individuals living that are a part of West Grove in
6 that area that's picking up the District 3 people.

7 Q. And the area that you're referencing there is
8 the little -- what we'll call the purple little
9 "foot" --

10 A. Uh-huh.

11 Q. -- with Natoma Manors?

12 A. Yes.

13 Q. Do you know why that particular piece was
14 drawn, that little foot was drawn for District 3?

15 A. I don't.

16 Q. Do you recall anyone mentioning that
17 Commissioner Carollo had a house at the very tip of that
18 foot?

19 A. I do.

20 Q. Do you have any reason to question that as the
21 reason why that foot was drawn there?

22 MR. MERKEN: Objection. Speculation.

23 BY MR. LEVESQUE:

24 Q. If you can answer.

25 A. I don't. I just only heard that his house was

1 there.

2 Q. You would agree that if they drew it to put his
3 house there, there wasn't a racial motivation behind
4 that move; correct?

5 A. I wouldn't know that.

6 Q. Would you have any reason to disagree with it?

7 A. To disagree with -- it was right --

8 Q. Whether it was racially motivated or not.

9 MR. MERKEN: Objection. Speculation.

10 BY MR. LEVESQUE:

11 Q. I'm not asking you to speculate. I'm asking
12 you what opinion do you have --

13 A. I'm not speculating. I don't have an opinion
14 one way or the other.

15 Q. Okay.

16 A. Yeah, I just know that they said his house was
17 there.

18 Q. Okay. On behalf of the South Dade NAACP, do
19 you believe that little foot was drawn with racial
20 motivations behind it?

21 A. As in NAACP, we didn't discuss it.

22 Q. Okay.

23 A. Uh-uh.

24 Q. Okay. But you did discuss the -- the
25 provisions related to the West Grove; correct?

1 A. Yes. Yes.

2 Q. And at least -- well, at the time the 2022 map
3 was drawn, who was the representative for District 2?

4 A. Ken Russell.

5 Q. And what is Commissioner Russell's race or
6 ethnicity?

7 A. Asian.

8 Q. And for District 4, do you know who the
9 commissioner was?

10 A. Let me see. Either Reyes or Carollo. I forget
11 which is on which side.

12 Q. Okay.

13 A. One or the other.

14 Q. And so you at least know that Reyes and Carollo
15 were in Districts 4 or 3. You just don't remember which
16 one belongs to which?

17 A. Right.

18 Q. And that's fine.

19 Is it fair to say that both Commissioner Reyes
20 and Commissioner Carollo are Hispanics?

21 A. Yes.

22 Q. Was there a concern about having a Black
23 community represented by a Hispanic commissioner?

24 A. Was there a concern about having a --

25 Q. Black community, that area of The Grove -- the

1 West Grove in that triangle, represented by a Hispanic
2 commissioner?

3 A. That question can be viewed two ways: that
4 there was an objection to the person being a Hispanic or
5 the population being moved into a predominantly Hispanic
6 area.

7 Q. Yes.

8 A. The fact that the individual is Hispanic is not
9 the issue.

10 Q. Okay. What is the issue, then?

11 A. The Black population losing their voice as a
12 part of a much larger Hispanic population and in smaller
13 clusters, because the whole population wasn't being
14 moved. It was being split in three pieces, diminishing
15 the voice of the individuals.

16 Q. And the three pieces that you're referring to
17 are --

18 A. Three districts. A small population of
19 people -- small pie being split into three pieces
20 diminishes the voice of this population when they
21 collectively came together.

22 Q. When you refer to the West Grove
23 geographically, what are you referring to?

24 A. West -- the population in West Grove?

25 Q. I'm just referring to geographically West

1 Grove, like, what boundaries -- what areas of the
2 broader Grove are you referring to? Or when you say
3 "West Grove," do you really mean all of Coconut Grove?

4 A. When I say "West Grove," no, I'm not talking
5 about all of Coconut Grove.

6 Q. Okay. And that's where I'm trying to kind of
7 get to.

8 A. Uh-huh. Okay.

9 Q. When we're talking about West Grove, if I
10 understood you correctly, my understanding is that your
11 primary concern, of what was being done to the residents
12 of West Grove?

13 A. As I'm representing the NAACP?

14 Q. Yes, ma'am.

15 A. The primary concern was West Grove.

16 Q. And in that regard, the Black residents that
17 are of concern to the South Dade NAACP primarily reside
18 in the West Grove. They don't reside in, necessarily,
19 the other parts of Coconut Grove; correct?

20 A. No, they could reside in the other parts of
21 Coconut Grove. The cluster was in West Grove. But, no,
22 they could reside in other parts of Coconut Grove.

23 Q. And I'm not suggesting that there's not Blacks
24 living in different areas, but the cluster -- the main
25 corpus of West Grove that was -- you know, that this

1 little triangle was offensive -- that offended the South
2 Dade NAACP, that's -- I just want to make clear, that's
3 really what we're talking about, isn't it?

4 A. Yes. As a representative of the NAACP, yes.

5 Q. As a representative of the South Dade NAACP,
6 did you have any concerns with how the City drew the
7 Black district for District 5?

8 A. Not a particular concern.

9 Q. Did you have any concerns with how the city
10 commission drew the boundary for District 4 that
11 involved the splitting of Flagami?

12 A. We didn't discuss it.

13 Q. Other than the West Grove, what are the other
14 areas of concern that the South Dade NAACP discussed?

15 A. Primarily from a concern standpoint, West
16 Grove. Broader implications would have been how is
17 District 5 being distributed? So it wasn't that we
18 didn't look at District 5.

19 Q. Fair to say that you were comfortable with the
20 way the City was drawing District 5?

21 A. In this particular map?

22 Q. Yes, ma'am.

23 A. Yeah, we didn't -- yeah, we didn't express a
24 particular concern with District 5.

25 Q. Let me ask this: If instead of splitting

1 Coconut Grove between three districts they put it all in
2 District 4 or all in District 3, would the South Dade
3 NAACP have been fine with that?

4 A. We honestly did not discuss that option.

5 Q. You indicated that part of the reason for the
6 offense was The Grove was being split between three
7 different districts that would -- that your concern was
8 it would diminish your voice --

9 A. Uh-huh.

10 Q. -- because your voice is no longer unified, but
11 if it's kept unified in a single district, does that
12 address your concerns?

13 A. I don't believe so.

14 Q. And why not?

15 A. I believe being moved into -- and I can't say
16 that we've discussed this. So maybe, since I'm just a
17 representative, I shouldn't voice my personal opinion as
18 it relates to this particular situation, because I can't
19 say that I'm representing the chapter because it has not
20 been discussed at a chapter level. It would be my
21 personal observation.

22 Q. Okay. Give me your personal observation.

23 A. My personal observation is putting West Grove
24 in any of those three districts diminishes the Black
25 voice. Given we have five districts and three of them

1 are dominated by Hispanics, I just think it gives a --
2 it gives less of an opportunity for rep- -- for
3 appropriate representation. But that's my personal
4 opinion.

5 Q. Well, let me ask about that. From your
6 personal standpoint, you've got Coconut Grove that's
7 kind of down there on the south part of the city, way
8 apart or far from District 5. Do you think it should be
9 connected with District 5 or -- there are only so many
10 different places you can place Coconut Grove in a
11 five-district map I guess is what I'm getting at.

12 And so what would your solution be to the issue
13 that you just raised?

14 A. I don't think that resolves the issue either
15 because now you have a situation of just packing all
16 Blacks into one district and not necessarily having a
17 citywide -- necessarily a citywide vote voice for
18 dispersion. So -- but, again, personal.

19 Q. What is your understanding of the racial
20 demographics for the Coconut Grove area?

21 A. There's quite a bit of diminishment racially --
22 Black population has diminished significantly over the
23 years from the time when I grew up here due to
24 gentrification.

25 Q. And that's something that's been happening

1 since the districts were originally drawn in 1997;
2 correct? In fact, over the 2013 to 2022 decade, they
3 reduced in proportional terms and relative terms;
4 correct?

5 A. Correct.

6 (Defendant's Exhibit Number 82-24, June 2023
7 Plan, was marked for Identification.)

8 BY MR. LEVESQUE:

9 Q. Ms. Donaldson, I am going to show you what
10 we're going to mark as Defendant's Exhibit 82-24.

11 MR. MERKEN: Thank you.

12 BY MR. LEVESQUE:

13 Q. And I'll represent to you that this is the map
14 the City passed in June 2023 of this year.

15 Do you recognize that plan?

16 A. Yes.

17 Q. And in looking at District 2 in that area of
18 the West Grove, you can see that that little triangle
19 that we spent some time talking about in the 2022 plan
20 has been removed from District 4 and put back into
21 District 2.

22 Would you agree with that?

23 A. Yes.

24 Q. And that's one of the things that the South
25 Dade NAACP was pushing for; correct?

1 A. Correct.

2 Q. And proportionally speaking, that would be
3 where the largest cluster of Black residents would live,
4 would have been in that little triangle; correct?

5 A. Well, as I said, not just within that little
6 triangle, but south -- yeah. Okay.

7 Q. South of that triangle?

8 A. Uh-huh.

9 Q. And so they were retained in District 2;
10 correct?

11 A. Correct.

12 Q. And there's still that little area that juts
13 down and captures Natoma Manors like before.

14 Does the South Dade NAACP have a concern with
15 that -- the way that particular aspect of District 3 and
16 District 2 are drawn?

17 A. I have not gone back to present this version of
18 the map to the chapter, that I could say I'm, you know,
19 expressing a collective voice or not.

20 Q. So let me ask this: As you sit here on behalf
21 of the South Dade NAACP, can you say one way or another
22 whether the South Dade NAACP has an objection to that
23 map, if you haven't discussed it with them?

24 A. Oh, no. I didn't say whether they had an
25 objection to the map. I haven't discussed it with them.

1 Q. Okay. Well, do they have -- I'm finding myself
2 in a circular discussion that I'm trying to get off.

3 As the corporate representative, does the South
4 Dade NAACP have an objection to the 23-271 map, the map
5 that was passed in 2023?

6 A. That's the map that I haven't discussed with
7 them.

8 Q. Okay. So you're unable to say one way or
9 another whether they object to this map?

10 A. I actually could not because I have not had
11 that discussion with them.

12 Q. Okay. What did the South Dade NAACP do to
13 influence the City as part of its redistricting process
14 as part of the 2020 census?

15 A. Specific to their support of West Grove?

16 Q. Either in support of the West Grove or broadly.

17 A. Okay.

18 Q. Just what did they do? If they supported West
19 Grove, you can identify that.

20 A. Okay.

21 Q. If there were other things that they did --

22 A. Yeah.

23 Q. -- what did they do?

24 A. Okay. So they did come out and voice their
25 support of West Grove. A brief note was sent to Chair

1 King sort of putting her on notice that they would be
2 monitoring the outcome and the process as we went
3 through the redistricting considerations.

4 An additional note regarding their opinion as
5 it relates to protecting the rights of citizens was sent
6 to the full commission. They did attend the rally that
7 we did at city hall, along with a commission meeting
8 where additional correspondence was presented on behalf
9 of the NAACP.

10 Q. Do you recall which commission meetings that
11 they presented at?

12 A. Ooh. Dates?

13 Q. Or --

14 A. Just in general?

15 Q. Yeah.

16 A. I don't remember specific dates. I believe it
17 was the -- one of the meetings in February may have been
18 the early note to Chair King, and a follow-up note to
19 the entire commission. On whatever date we did the
20 rally, that would have been February or March, myself
21 and several other NAACP members were there, because they
22 had on their shirts.

23 At one of the meetings -- I would have to go
24 back and look at a calendar to think about which
25 meeting. The president at that time, Dwight Bullard,

1 attended a meeting when we addressed the commission,
2 along with the North Dade chair. So both chairs were at
3 that meeting.

4 Q. Who are the current officers of the South Dade
5 NAACP?

6 A. Oh, officers have changed, so -- I don't know
7 the names of all the current officers.

8 Q. At the time of the 2022 redistricting effort,
9 from November/December of 2021 --

10 A. Uh-huh.

11 Q. -- through March 2022, do you know who the
12 officers were?

13 A. Brad would have been an officer. Dwight
14 Bullard was an officer, and replaced by Harold Ford.
15 Brad Brown has been replaced by Merline Malcolm. Carole
16 Jackson. I'm trying to think of who else. I don't
17 know -- I don't remember the names of some of the
18 people.

19 Q. And what was -- do you recall what Brad Brown's
20 title was?

21 A. Secretary.

22 Q. And Dwight Bullard, is that former Senator
23 Bullard?

24 A. Yes. Former Senator Bullard. He was
25 president.

1 Q. And Carole Jackson?

2 A. Carole Jackson's title is -- she handles all of
3 the voter registrations. I can't think of her -- what
4 her official title -- it might be engagement chair.

5 Q. And then --

6 A. And Freddie Young was in charge of education.
7 I don't know who replaced Freddie.

8 Q. And I think you said that Merline Malcolm --

9 A. Replaced Brad.

10 Q. -- replaced Brad as the secretary?

11 A. Uh-huh.

12 Q. And Mr. Ford replaced --

13 A. Right.

14 Q. -- Senator Bullard as the president?

15 A. Right.

16 Q. Is Carole Jackson still in the same role?

17 A. Yes.

18 Q. Is Mr. Young still in the same role?

19 A. Who?

20 Q. Freddie Young?

21 A. Freddie Young? No, someone replaced Freddie.

22 Q. Was there anybody else that you can recall?

23 A. That I can think of? No, I don't recall the
24 other names.

25 Q. Now, you mentioned that some of the activities

1 that the South Dade NAACP were involved with, including
2 sending a brief note to Chair King, you were monitoring
3 the outcome of the process.

4 Do you recall when that note was sent?

5 A. Between late January, early February. Sometime
6 within that time frame.

7 Q. And would this have been, like, a letter signed
8 by one of the board members?

9 A. Yeah, it was signed by Brad, myself, and
10 Dwight.

11 Q. Did you personally have communications with any
12 commissioners about the districting process?

13 A. We had a town hall meeting that was put on by
14 Ken Russell.

15 Q. And did you speak with Commissioner Russell at
16 that meeting?

17 A. I expressed my concerns.

18 Q. Okay. And what were the concerns that you
19 expressed to Commissioner Russell?

20 A. That West Grove was being split. We were a
21 strong voter bloc, and I had concerns that it was going
22 to be diminishing our ability to be effective. And it
23 will impact a number of things.

24 We had a CRA that at that time was in the
25 works, and I felt that would potentially disappear, and

1 we wouldn't be able to be a collective voice on how that
2 could be a financial engine for West Grove and the
3 redevelopment process.

4 Q. And how exactly would your voice potentially be
5 diminished?

6 A. Because it was the West Grove that was pushing
7 for the CRA in order to fund redevelopment along Grand
8 Avenue, and this was going to generate the funds to
9 allow us to be able to do that.

10 Q. I guess what I'm asking is I understand sort of
11 what you were concerned about with losing your voice,
12 that the CRA wouldn't reach its full realization, but
13 you're a Black community in a district with an Asian as
14 its commissioner, and you were concerned about being
15 placed in a district with a Hispanic as its
16 commissioner.

17 Can you explain to me what the -- the
18 diminishment of your voice, if neither of those are
19 members of the Black community, but certainly you would
20 agree that they can be responsive to people that look
21 different from them, can't they?

22 A. Oh, absolutely. Anybody can. But my
23 experience had been with this particular commissioner,
24 and I do believe that the numbers made a difference with
25 how many of us could actually come out and vote and

1 voice our opinion. So splitting us up would mean we
2 would have less of an opportunity to address those
3 developmental issues, and we worked very hard to get to
4 that point. So it was a concern.

5 Q. When you say you had experience with a
6 particular commissioner, which commissioner was that?

7 A. District 2 commissioner. We had worked with
8 our District 2 commissioner to get us to that point.

9 Q. Uh-huh.

10 A. So putting us in another district would be like
11 starting all over.

12 Q. Does the South Dade NAACP have any opinion on
13 Commissioner Covo, who was elected to that district to
14 replace Commissioner Russell?

15 A. I've not discussed it with them.

16 Q. Have you discussed anything related to the
17 concerns that South Dade NAACP might have related to the
18 current 2023 plan?

19 MR. MERKEN: Objection. Asked and answered.

20 BY MR. LEVESQUE:

21 Q. If you can -- if you can answer.

22 A. Oh, but what am I -- what am I answering?

23 Q. I'm trying to figure out if -- you said that
24 the 2023 plan hasn't been presented to your board.

25 A. Correct. That's correct.

1 Q. So as we sit here today, then, if it hasn't
2 been presented to the board, is it fair to say that at
3 this point in time, the board doesn't have an objection
4 to the 2023 plan?

5 A. Oh, I can't say that because I don't know that.
6 I don't know that to be a fact.

7 Q. Well, if it hasn't been presented to the board,
8 could they have formulated a position on something that
9 hasn't been presented to them?

10 A. What I can say is I have not presented it to
11 the board and had that discussion. I don't know if
12 someone else has presented it to them. I can only speak
13 to what I have physically had a discussion on and gotten
14 feedback on. And so for this particular plan, I've not
15 done that. I've not had that discussion.

16 I did on this one. I didn't on this one.

17 Q. Are you able to talk about the impacts that the
18 2023 plan has on the members of the South Dade NAACP?

19 A. The impact that it has on the members of --
20 well, I guess I can't relative to Districts 3 and 4
21 because I don't actually know who they are or how it's
22 impacted them with these changes. I guess my answer is,
23 no, I can't.

24 MR. LEVESQUE: Why don't we go ahead and take a
25 short break?

1 (Thereupon, a recess was taken in the
2 deposition, after which the deposition continued as
3 follows:)

4 (Defendant's Exhibit Number 82-34, Map 1, was
5 marked for Identification.)

6 BY MR. LEVESQUE:

7 Q. And, Ms. Donaldson, I am going to show you what
8 we will mark as Plaintiffs' -- I'm sorry -- Defendant's
9 Exhibit 82-34.

10 MR. MERKEN: Thank you.

11 BY MR. LEVESQUE:

12 Q. Ms. Donaldson, do you recognize Plaintiffs'
13 Map 1?

14 A. Yes.

15 Q. Have you seen this before today?

16 A. Yes.

17 Q. Did you see it before it was submitted to the
18 court on July 6th, 2023?

19 A. I don't know the date timing, but I've seen it.

20 Q. Okay. You just don't recall if it was
21 submitted before -- if you saw it before or after it was
22 submitted to the court?

23 A. I probably saw it before.

24 Q. Okay. Do you know if anyone from the South
25 Dade NAACP approved this map for filing?

1 A. I -- I don't know if there is an approval
2 process, but I reviewed it and was representing the
3 NAACP as I was the person delivering updates to the
4 NAACP. So I would have felt that in representing them
5 this map was being presented. And I definitely looked
6 at it.

7 Q. Okay. Do you recall if the board ever voted on
8 this map?

9 A. The board didn't specifically vote on the map.
10 I gave them verbal updates to -- to directionally talk
11 about the fact that we had drawn a map -- or we had
12 provided input to the attorneys -- I don't actually know
13 who draws the maps, in all honesty, but I had provided
14 input on our desire to keep the communities together and
15 particularly those communities that have been
16 historically considered District 2.

17 So as a part of my discussion, when I talked
18 about District 2, which is where the West Grove sits, I
19 frequently talked about District 2 as a whole and
20 specifically West Grove.

21 Q. Okay. Did the South Dade NAACP board express
22 any opinions about which neighborhoods should be kept
23 intact and which neighborhoods it was acceptable to
24 split?

25 A. No. We get -- we didn't get to that level of

1 specifics.

2 Q. Did you get to the level of specifics that
3 Coconut Grove needed to be kept whole?

4 A. Yes. But I'm saying verbal. Not that I gave
5 them a map. But verbal, yes.

6 Q. Did you get to the specifics that Flagami
7 needed to be united, that area in the western part of
8 the city needed to be united in one district?

9 A. How I phrased it to the board was in any
10 iteration of the maps, our goal was to keep as many
11 communities whole while also addressing the anomaly of
12 the number of folks that needed to be redrawn based upon
13 the redistricting. That's the way I -- that's the way I
14 typically phrased it.

15 Q. Are you aware of anyone that testified before
16 the city commission that Flagami needed to be united the
17 way that plaintiffs united it here in Map 1?

18 A. I -- I don't specifically remember it.

19 Q. Are you aware that Flagami has been split
20 between District 1 and District 4 since the districts
21 were first drawn in 1997?

22 A. No, I didn't know that. Uh-uh.

23 Q. If the residents of Flagami are not complaining
24 about being split between two districts, do you think
25 it's justifiable to pack them all into a single

1 district?

2 MR. MERKEN: Objection. Speculation.

3 MR. LEVESQUE: It's not speculation. I'm
4 asking for her opinion.

5 THE WITNESS: I can't specifically say that
6 Flagami didn't say that they wanted to be together.
7 We were approached during this process by several
8 communities and their associations. Once they
9 understood that our goal was to try and put as many
10 communities -- keep as many communities whole as we
11 possibly could. So I -- I couldn't say to you that
12 they are not one of the communities that reached out
13 to us.

14 BY MR. LEVESQUE:

15 Q. Can you identify any of those communities?

16 A. That reached out to us?

17 Q. Yes, ma'am.

18 A. A community -- Biscayne. Biscayne, which
19 probably is somewhere up in this district.

20 Q. And I'm sorry to interrupt.

21 When you say "this district," which district
22 are you referring to?

23 A. For Biscayne? See, I don't -- I believe
24 Biscayne was previously part of District 2, and they
25 wanted to remain together. And there were two other

1 districts that reached out to us. There were two other
2 associations that reached out to us and expressed they
3 wanted to keep their communities together.

4 I didn't specifically, myself, look at where
5 they were located on the map or what districts they were
6 in, but anyone reaching out, I did share it with the
7 attorneys that, oh, gee, this person, we've got an
8 e-mail from, and they've expressed that their -- you
9 know, they would like to keep their community together.

10 So I can't say if it was Flagami because they
11 may not refer to themselves that way. I don't know.
12 They may or they may not.

13 Q. But to be clear, you can't say one way or
14 another whether anybody from that area came to you and
15 said, "Please -- please unite these two areas into one
16 district"?

17 A. I can't, no.

18 Q. Was the South Dade NAACP happy with the way the
19 plaintiffs drew District 5 in this matter?

20 A. In P-1, plaintiffs' map?

21 Q. Yes.

22 A. Was the South Dade district happy?

23 Q. South Dade NAACP --

24 A. Okay.

25 Q. -- happy with the way District 5 was drawn.

1 A. South Dade didn't express a concern.

2 Q. So when the South Dade NAACP sent a letter to
3 Commissioner King, who's the commissioner in District 5,
4 that you'd be monitoring the -- the process, you would
5 have been fine if this was the map imposed by the court?

6 A. I wouldn't have -- I don't know that we would
7 have necessarily have had an objection. At the time I
8 was looking at Map 1, I was also looking at an optional
9 Map 2.

10 Q. What is your understanding of Commissioner
11 King's thoughts on this version of District 5?

12 A. She was not happy.

13 Q. Did she let the South Dade NAACP know that she
14 was not happy?

15 A. Not personally. She made a statement publicly.

16 Q. Did you agree with her statement?

17 A. I was perplexed a little on her statement since
18 she had originally approved the enacted plan, which
19 split some of her area -- some of her district.

20 Q. Have you looked at the -- the racial
21 demographics and electoral numbers for the enacted
22 plan -- the 2022 plan and plaintiffs' Map 1 for
23 comparison?

24 A. Not for -- well, for comparison, but I didn't
25 form an opinion from it one way or the other. On some

1 maps, the data was there, so I did look at it if the
2 data was there. I didn't form an opinion as it relates
3 to the data.

4 Q. And I know you say you don't know who drew the
5 map.

6 Do you know when the map was drawn?

7 A. When the map was drawn? I'm just trying to
8 think of the time frame. We've had so much transpire.

9 I don't really want to indicate dates because
10 I -- I don't recall the exact dates.

11 Q. You mentioned an alternative map. Did you see
12 the alternative map at the same time you saw Map 1?

13 A. Yes.

14 Q. And how were -- how was Map 1 and the
15 alternative map shared with you?

16 A. I believe they were e-mailed to me. They were
17 either e-mailed -- they were either e-mailed to me or
18 presented to me in a meeting. One of the two. Either
19 e-mail or a meeting. But I've had so many meetings.

20 Q. And when you say you've had so many meetings,
21 meetings related to redistricting?

22 A. Just so many meetings, period.

23 Q. Okay.

24 A. That's why I don't want to say dates,
25 because -- you know.

1 (Defendant's Exhibit Number 82-35, Map 2, was
2 marked for Identification.)

3 BY MR. LEVESQUE:

4 Q. And, Ms. Donaldson, I am going to show you
5 another exhibit that we're going to mark as Defendant's
6 Exhibit 82-35.

7 MR. MERKEN: Thank you.

8 BY MR. LEVESQUE:

9 Q. And do you recognize that map, Ms. Donaldson?

10 A. Yes.

11 Q. Did anyone from the South Dade NAACP review
12 this map before it was submitted to the court?

13 A. I did.

14 Q. Does this look like the alternative map that
15 you viewed?

16 A. It does.

17 Q. And you indicated that one of the driving
18 concerns was keeping certain communities whole; is that
19 correct?

20 A. That's correct, uh-huh.

21 Q. Is that also part of the goal of this map, too?

22 A. Yes, it is.

23 Q. And you recognize that, at least in this map --
24 version of Map 2, Overtown is split?

25 A. Yes.

1 Q. And Little Havana is split?

2 A. And what is split?

3 Q. Little Havana.

4 A. Yes.

5 Q. And parts of downtown are split between three
6 districts?

7 A. Well, I think it depends upon how you view the
8 community. We said "communities," so in -- in looking
9 at some of the communities, while you might identify an
10 area by a broader name, input from smaller areas within
11 a particular name are not necessarily identified on here
12 to say whether that's a community that's being kept
13 together or not.

14 Q. Can you provide an example of what you're
15 discussing?

16 A. Okay. If you said District 2 and whether it's
17 being split, but there are a whole host of communities
18 going up the coast, so sometimes we identify the smaller
19 communities in trying to keep them together.

20 So if I start on the west -- on the southwest
21 end, Silver Bluff was put back into District -- whatever
22 the purple one is -- District 3, and all of Silver Bluff
23 was put back in there along with Shenandoah, which is an
24 area that's identified as a community. So people think
25 of Shenandoah, and then you've got the roads in there.

1 Q. And when you say "put back in," are you
2 referring to changes from --

3 A. There were changes -- the changes on the lines,
4 the district line, yeah.

5 Q. Between Maps 1 and 2? That looks like it's --

6 A. Between Maps 1 and 2, yeah.

7 Q. Okay.

8 A. Yeah, that's what I'm looking at.

9 Q. And so you would agree that Silver Bluff
10 historically has been in District 4; correct?

11 A. I -- I don't know if Silver Bluff has been
12 historically in District 4. There were times when
13 Silver Bluff -- we would have thought of it as
14 District 2, but obviously in conversation, as people
15 start to identify themselves -- so that's why I'm saying
16 when you've been around for so long, every community has
17 been someplace, in our -- in my mind.

18 So, therefore, when we're talking about it, we
19 usually have dialogue around "Oh, well, no. They're
20 considered over there now," and some of this area wasn't
21 even called some of the names that you have here.

22 Q. Uh-huh.

23 A. An example: Like, the Silver Bluff was kind of
24 newer to some of us because we used to call it an area
25 called "Sweeting Town". So then they said no, but they

1 changed the name of it and this and that. "Oh, really,
2 that's what that is?" That kind of conversation would
3 take place.

4 Q. And those lines get moved regularly in every
5 census because of the population changes; correct?

6 A. I would have -- I don't -- I can't say that
7 because this is my first time having to work this
8 closely with this process. But that is my
9 understanding. But this is my first time having to go
10 through this exercise.

11 (Defendant's Exhibit Number 24-80, 1997 Plan,
12 was marked for Identification.)

13 MR. LEVESQUE: I'm going to be marking this as
14 Defendant's Exhibit 24-80.

15 MR. MERKEN: Thank you.

16 BY MR. LEVESQUE:

17 Q. Ms. Donaldson, I'll represent to you that that
18 is the 1997 plan that was drawn when the districts were
19 first drawn.

20 Do you recognize that plan?

21 A. The 1997 plan -- I have not seen this.

22 Q. Okay. And so for your preparations as the
23 corporate representative, this is not a plan that you
24 looked at?

25 A. I have not looked at the 1997 plan.

1 Q. Okay. Well, that makes the questions about
2 that document very easy.

3 A. Okay.

4 (Defendant's Exhibit Number 24-81, 2003 Plan,
5 was marked for Identification.)

6 BY MR. LEVESQUE:

7 Q. So if I could ask you to --

8 MR. LEVESQUE: We'll mark this as Defendant's
9 Exhibit 24-81.

10 MR. MERKEN: Thank you.

11 BY MR. LEVESQUE:

12 Q. And I'll represent to you that this is the 2003
13 plan that was enacted by the city commission.

14 Have you seen this plan before?

15 A. No. No. I have not seen the 2003 plan.

16 Q. Okay.

17 (Defendant's Exhibit Number 24-82, 2013 Plan,
18 was marked for Identification.)

19 MR. LEVESQUE: Okay. We'll mark this as
20 Defendant's Exhibit 24-82.

21 MR. MERKEN: Thank you.

22 BY MR. LEVESQUE:

23 Q. And I will ask have you -- I'll represent to
24 you that this is the plan that was enacted by the city
25 commission in 2013. Have you seen the 2013 plan before?

1 A. No.

2 Q. Okay. In looking at the 2013 plan and
3 the 2003 --

4 A. Uh-huh.

5 Q. -- do you see where portions of Silver Bluff
6 are included in District 4?

7 A. Yes.

8 Q. And it had a configuration that was
9 substantially similar in that geographic area for
10 both 2003 and 2013; correct?

11 A. That's correct. Uh-huh, yes.

12 (Defendant's Exhibit Number 82-36, Map 3, was
13 marked for Identification.)

14 BY MR. LEVESQUE:

15 Q. Okay. I am going to show you what we're going
16 to mark as Defendant's Exhibit 82-36.

17 MR. MERKEN: Thank you.

18 BY MR. LEVESQUE:

19 Q. Do you recognize Plaintiffs' Map 3?

20 A. I do.

21 Q. Is this the map that you discussed with the
22 South Dade NAACP board?

23 A. I discussed this map with -- with Brad, yes.

24 Q. Did you discuss it with the other board
25 members?

1 A. Some of them; not all of them.

2 Q. And what was the nature of those discussions?

3 A. We were going back in to rectify, after our
4 discussions with North Dade branch, areas that had been
5 historically a part of Overtown.

6 Q. And so is this map an effort to include more of
7 the historic Black area of Overtown in District 5?

8 A. Based upon the discussions with the community.
9 We had a town hall meeting with them.

10 Q. When was that town hall meeting?

11 A. You're asking me for a date?

12 Q. Roughly.

13 A. Hmm. Let's see. The town hall meeting with
14 Overtown -- I don't know. It's on my calendar.

15 Q. Who organized the town hall meeting?

16 A. Daniella.

17 Q. And who is Daniella?

18 A. The president for the North Dade branch.

19 Q. And did she invite the South Dade branch up for
20 that meeting?

21 A. Yes, she did.

22 Q. And where was that meeting held?

23 A. Off of Northwest 3rd and -- it was held at one
24 of their community centers that's a part of a church.

25 Q. What's Daniella's last name?

1 A. Daniella Pierre.

2 Q. How was this town hall publicized?

3 A. A flyer went out. Notices went out. They
4 handled the distribution on their end, and we received a
5 copy of the flyer and notification that they were having
6 the meeting.

7 Q. Did you distribute the flyer notifications to
8 your members?

9 A. I'm going to say yes. Yes, because those two
10 newsletters were attached. Yes, it did go -- go out.

11 Q. And how did those communications get sent to
12 your members?

13 A. Constant Contact.

14 Q. Is that like a software or kind of --

15 A. It's like a software, yeah. It's like -- yes,
16 it's a software. And -- and then flyers and any
17 information, we send it to the -- to the chapter
18 secretary, and they take care of distributing it.

19 Q. So does the chapter secretary maintain an
20 e-mailing list?

21 A. I don't know if it's attached to national or
22 not. So I don't know. I don't know how it is
23 distributed. But it goes -- the distribution goes out
24 and it comes via e-mail.

25 Q. Okay. Other than this town hall meeting, were

1 there other town hall meetings that were held?

2 A. Yes. We had a town hall meeting with Ken
3 Russell. We had a town hall meeting with GRACE. There
4 was a -- one Grove rally and meeting that was publicized
5 communitywide. Those -- those were the -- those were
6 the town hall meetings.

7 Q. Okay. Going back to the town hall meeting with
8 the Miami-Dade NAACP that was organized by Daniella
9 Pierre, was that before or after the 2022 plan?

10 A. After.

11 Q. Okay. Was that before or after the plaintiffs
12 had presented Maps 1 and 2 to the City for
13 consideration?

14 A. After.

15 Q. So if I understood correctly, then, from a
16 sequence, it would have been before Map 3 was presented
17 but after Maps 1 and 2 were presented; is that correct?

18 A. Let me think of the timing there. No, it would
19 have to be after 3 because we took into account
20 community input. We had already gotten the
21 commissioner's comments about Overtown being broader.
22 We discussed how Overtown used to look -- I would have
23 to say it's after.

24 Q. Okay. You -- you mentioned Commissioner King's
25 comments about Overtown being broader. Can you explain

1 that.

2 A. She just felt her area had been split. That
3 Overtown -- that Overtown had been split.

4 Q. Uh-huh.

5 A. And -- and that generated conversation around
6 old Overtown versus new Overtown. So for those of us
7 that have been around since the beginning of time, we
8 know how these communities used to look.

9 Q. Uh-huh.

10 And was there universal agreement on what
11 constitutes Overtown?

12 A. Once we came together with the community. The
13 community started pointing out where things were, where
14 lines were drawn, and -- and they provided their input.

15 Q. Okay. And so that community meeting would have
16 been, then, after Map 3, if I understood what you were
17 testifying there?

18 A. I believe so. I mean, we had already started
19 to gather data on what the community perceived to still
20 be Overtown.

21 (Defendant's Exhibit Number 82-37, Map 4, was
22 marked for Identification.)

23 BY MR. LEVESQUE:

24 Q. Okay. I'm going to show you Defendant's
25 Exhibit 82-37.

1 MR. MERKEN: Thank you.

2 BY MR. LEVESQUE:

3 Q. Looking at Map 4, do you recognize Map 4?

4 A. I do, uh-huh.

5 Q. In looking at the configuration of District 5,
6 does this reflect that community consensus over what the
7 borders of Overtown were?

8 A. It does. Because they talked about those roads
9 that went over on the other side of where some
10 construction and stuff had been done.

11 Q. Uh-huh.

12 A. It does. It reflects it, uh-huh.

13 Q. Are you aware that Commissioner King wanted
14 areas south of that area of Overtown in her district as
15 well?

16 A. She expressed it verbally. Not at this
17 meeting, but I heard her say that before, uh-huh.

18 Q. Okay. Was she at the meeting where there were
19 discussions of -- the town hall meeting where there were
20 discussions of Overtown?

21 A. She wasn't, uh-uh.

22 Q. Do you know if she was invited?

23 A. Yes. I know she was invited. I'm not sure
24 where she was, but --

25 Q. Did anybody from her office come to that

1 meeting?

2 A. I don't know.

3 Q. Do you know if she agreed with the borders of
4 Overtown here?

5 A. She's not had that discussion with me. She may
6 have with Daniella.

7 Q. Okay.

8 A. We didn't hear any negative feedback from her
9 after.

10 Q. Do you know if she had any discussions with
11 anyone from the South Dade NAACP regarding the
12 configuration of District 5 in Map 4?

13 A. I -- no, I don't. It was not indicated to me
14 that anybody spoke with her.

15 Q. Now, in plaintiffs' Maps 2, 3, and 4, they
16 include a significant portion of areas like Silver Bluff
17 in all of their plans into District 3.

18 A. Uh-huh.

19 Q. Where those areas had never ever been in
20 District 3 before.

21 Do you see that?

22 A. Okay. Let me look at your other maps.

23 Okay.

24 Q. Now, would you agree that historically Silver
25 Bluff has either been in District 2 or split between

1 District 2 and 4; correct?

2 A. Historically.

3 Q. Historically?

4 A. Yes.

5 Q. Just like Coconut Grove has historically only
6 been in District 2; correct?

7 A. Correct.

8 Q. Do you know why it would be a good idea to
9 place an area that's never been in District 3 in
10 District 3?

11 A. Not really. Unless it was one of the requests
12 that was being made by one of the commissioners as a
13 part of those discussions. They did discuss extensively
14 areas that they wanted in their districts that they felt
15 were preferred to be in their districts. From the
16 various meetings we had, they constantly talked about
17 areas that they would like in their districts.

18 Q. When you're talking about the commissioners
19 talking about areas that they want in their districts,
20 was that a part of the plaintiffs' development -- of
21 plaintiffs' Maps 1, 2, 3, and 4, or was it a part of the
22 process that resulted in either the 2022 plan or the
23 2023 plan?

24 MR. MERKEN: Objection to the extent it calls
25 for privileged conversations with counsel.

1 So don't mention anything privileged.

2 BY MR. LEVESQUE:

3 Q. Well, let me break up the question some.

4 Has the South Dade NAACP participated in any
5 discussions with any commissioner about the drawing of
6 any of the plaintiffs' maps?

7 A. Directly?

8 Q. Yes. Any commissioner.

9 A. Other than myself?

10 Q. But anybody from the -- anybody from the South
11 Dade NAACP, did you -- did anybody from the South Dade
12 NAACP discuss plaintiffs' Plan 1 with any commissioner?

13 A. No.

14 Q. Did anybody from the South Dade NAACP discuss
15 plaintiffs' Plan 2 with any commissioner?

16 A. Well, before I say no, I can't speak for every
17 member of the NAACP and whether they spoke to anyone.
18 So I didn't.

19 Q. Okay. So as -- let me frame it this way.

20 As you sit here today, you're not aware of
21 anyone from the South Dade NAACP speaking with any
22 commissioner about Plan 1?

23 A. No.

24 Q. And same question for Plan 2. As you sit here
25 today, you're not aware of anyone from the South Dade

1 NAACP speaking with any commissioner related to Plan 2?

2 A. Correct.

3 Q. And would the same also be the case for Plan 3
4 and Plan 4?

5 A. Plans 3 and 4? Hmm. I don't believe so.

6 Q. Are you aware of anyone telling the South Dade
7 NAACP that they wanted Silver Bluff to be kept whole in
8 District 3?

9 A. No.

10 Q. Are you aware of anyone expressing a desire to
11 have Little Havana split between District 1 and District
12 3?

13 A. A commissioner or somebody from NAACP?

14 Q. Well, somebody that expressed that desire to
15 the NAACP.

16 A. Not that I'm aware of.

17 Q. And in looking at all of the plaintiffs' maps,
18 you would agree that the maps generally are likely to
19 perform where you have three Hispanic districts and a
20 Black district; is that accurate?

21 A. What do you mean "perform"?

22 Q. Fair question.

23 In looking at Districts 1, 3, 4, and 5, in
24 every map those districts are likely to elect three
25 Hispanic candidates and one Black candidate. Would you

1 agree with that?

2 A. Yes.

3 Q. And that's true in all of plaintiffs' plans;
4 correct?

5 A. Yes.

6 Q. And it's also true in all of defendant's plans;
7 correct? And that's a poor question. Let me break that
8 down.

9 That's true in the 2022 plan that was passed by
10 the city commission; correct?

11 A. Yes.

12 Q. And it's also true of the 2023 plan that was
13 passed by the commission this year; correct?

14 A. I guess I can look at what the City has on it.
15 Let me look at '23 again.

16 This one is '23?

17 Q. I apologize.

18 A. A third of '21. 2, 3, 4.

19 Q. It would be one that looks like this.

20 A. Okay.

21 Okay. So now what was the question about this
22 one?

23 Q. That is also likely to elect three Hispanic
24 representatives and a Black representative for Districts
25 1, 3, 4, and 5, respectively?

1 A. Hmm. Possibly.

2 (Defendant's Exhibit Number 24-33, Affidavit,
3 was marked for Identification.)

4 BY MR. LEVESQUE:

5 Q. Okay. Ms. Donaldson, I'm going to show you
6 what we are going to mark as Defendant's Exhibit 24-33.

7 MR. MERKEN: Thank you.

8 BY MR. LEVESQUE:

9 Q. Ms. Donaldson, do you recognize that document?

10 A. Yes.

11 Q. Now, you are not a party to this litigation,
12 are you, personally?

13 A. No.

14 Q. How did it come that you would be completing
15 this affidavit -- this declaration?

16 A. We were in the midst of transitioning
17 presidents -- or chairs. So I was the acting chair as
18 the vice-chair of this organization.

19 Q. Okay. And who is currently the chair of that
20 organization?

21 A. Reynold Martin.

22 Q. Is he the official chair or is he an acting
23 chair as well?

24 A. He's an official chair now, uh-huh.

25 Q. Okay. Do you know if Mr. Martin testified to

1 the City?

2 A. With -- you mean, has he ever spoken at city
3 hall?

4 Q. Yeah, fair point. Again, bad question on my
5 part.

6 Do you know if Mr. Martin ever testified on
7 behalf of the Grove Rights and Community Equity
8 organization related to the redistricting plans
9 considered by the City?

10 A. I don't know.

11 Q. Have you attended city commission meetings with
12 Mr. Martin?

13 A. Yes.

14 Q. In this declaration, you indicate that GRACE
15 members live principally in the city commission
16 Districts 2 and 4.

17 What is your basis for that assertion?

18 A. The basis for that assertion is I've had to
19 complete documents indicating where the various board
20 members lived.

21 Q. And so in terms of the 2022 plan that this map
22 or this declaration would be addressing, what members
23 live in District 2?

24 A. What members live in District 2 of the board
25 members?

1 Q. Yeah. Board members are fine.

2 A. Clarice Cooper. John Chambers. Let's see who
3 lives in District 2. Let's see. As I was looking at it
4 for the 2022 -- they're the two that live there. The
5 others represent organizations in District 2.

6 Q. Okay. And what board members reside in
7 District 4?

8 A. There isn't a board member residing in
9 District 4.

10 Q. Is there another member that you're aware of
11 that resides in District 4?

12 A. I believe there is a member that resides in
13 District 4.

14 Q. Do you know who that member is?

15 A. I -- I don't, right offhand.

16 Q. Do you know what area or address they live in,
17 in District 4?

18 A. It's right here along this US 1 corridor. I
19 don't. I don't. I don't want to guess on -- because I
20 don't necessarily know exactly where people live.

21 Q. Okay. And if we wanted to figure out what
22 members -- what members of GRACE live in District 4,
23 what would be the best way to do that?

24 A. We would have to ask them their addresses. We
25 don't keep a roster.

1 Q. Okay. So GRACE doesn't keep a membership list?

2 A. By organization.

3 Q. Okay. But not individual members?

4 A. But not individual.

5 Q. Is it possible for individual members to become
6 a member of GRACE?

7 A. Not at this point in time, they couldn't.
8 Yeah, not at this point in time. They would not be able
9 to.

10 Q. In paragraph 6 on page 2, you see "GRACE is
11 deeply concerned by this new city commission's map
12 division of the West Grove into Districts 2 and 4."

13 Is it fair to say, because you've never
14 discussed the 2023 map with your board, you don't know
15 if your board still feels the same way about the 2023
16 plan?

17 A. No. You're asking me the board of GRACE or the
18 board of the NAACP?

19 Q. I'm sorry. The board of the NAACP.

20 A. Oh, okay. That's true, yes.

21 Q. And when you executed this declaration, you
22 didn't do it on behalf of the NAACP. You did it on
23 behalf of GRACE; correct?

24 A. That's correct.

25 Q. Now, in this, you say, "The West Grove has a

1 deep connection to the rest of Coconut Grove."

2 What is the deep connection?

3 A. We all grew up -- not we all. Most of us grew
4 up in Coconut Grove. Went to school in The Grove. Most
5 of us worship in The Grove. Still serve on the boards
6 of our churches or are in other leadership roles of our
7 churches in The Grove. So The Grove's existence is
8 critical to most of us.

9 Q. Uh-huh.

10 A. And most of us are very passionate about it.

11 Q. And I guess would you agree that there's been
12 significant gentrification in the area of Coconut Grove?

13 A. Absolutely.

14 Q. And you mentioned a deep connection. And what
15 you seem to describe relates to historical areas and
16 geography. Would that be fair?

17 A. Historical and geography? I would add to that
18 some of our parents still live there. Our relatives
19 still live there. Some people have -- children were
20 born there in The Grove. It's deeper than geographic.

21 Q. Well, what I'm trying to sort of flesh out is
22 when you're talking about those connections --

23 A. Uh-huh.

24 Q. -- the way the sentence is framed is you have
25 "the West Grove has a deep connection to the rest of

1 Coconut Grove." And I guess -- what wasn't clear from
2 your answer when you were providing those types of
3 examples, are all of those things going on all over
4 Coconut Grove or are they going on primarily in West
5 Grove, and am I missing the connection of what's going
6 on with the rest of Coconut Grove?

7 A. Okay. Okay. There are things going on
8 throughout the entire Grove. The separation into
9 regions within The Grove are more recent. We only
10 thought of The Grove as The Grove. Growing up, it was
11 The Grove. You didn't have East, West, North, South.
12 We were The Grove.

13 Q. Uh-huh.

14 A. It wasn't until I came back professionally and
15 had retired that I realized it was West Grove.

16 So our ties and cultural roots are throughout
17 The Grove, as Bahamians and non-Bahamians that came here
18 and built The Grove. So -- and the Black population was
19 the workers in The Grove. So we have a different -- our
20 attachment and our ties. So irrespective of the
21 gentrification, our attachment is to The Grove.

22 Q. I probably should have asked this earlier and I
23 apologize.

24 Can you describe for me your background.
25 You've mentioned Bahamian, Black. Sometimes there's a

1 difference.

2 A. Okay.

3 Q. And just describe your heritage a little bit
4 for me.

5 A. Well, my heritage -- my family is a part of
6 Blacks that migrated from the Deep South, Georgia and
7 the Carolinas, running from slavery --

8 Q. Uh-huh.

9 A. -- to South Florida and settling in The Grove
10 and having been there for many, many years. So I'm not
11 of Bahamian descent.

12 Q. Okay. And so both of your parents, then,
13 emigrated from Southern Georgia?

14 A. My -- my dad from Georgia -- my dad is from
15 Cairo.

16 Q. Okay.

17 A. And my mom is from Wilmington --

18 Q. Okay.

19 A. -- North Carolina. And Flagler and the
20 railroad, and my grandfather --

21 Q. In paragraph 8, you state that "GRACE is
22 especially concerned that the West Grove, and Coconut
23 Grove more broadly, were split into different districts
24 to achieve a particular desired racial balance over
25 different districts."

1 What particular desired racial balance are you
2 referring to?

3 A. Well, in each of the districts, if the racial
4 statistics -- and I don't know what they were because I
5 did not focus a lot on that, but I certainly would think
6 the -- our assumption was this would put a certain
7 number of Blacks in each one of the districts if we were
8 split.

9 Q. And do you believe that was the intent of the
10 city commission, to split Blacks into three different
11 districts?

12 A. I don't necessarily know the intent of what the
13 commission was doing. Oftentimes, it just didn't make
14 sense. But it appeared to be a concerted effort to
15 split The Grove.

16 Q. Well, again, back to -- you talk about a
17 "particular desired racial balance." What is the racial
18 balance that you were referencing?

19 A. I didn't do numbers to get to that statement,
20 but I personally felt that this might be needing some --
21 some -- I don't know. For lack of other words, quota or
22 whatever, because they kept -- the guys talked about --
23 the grandee talked about a lot of numbers.

24 And I didn't go in depth into the numbers, but
25 I knew that they needed to split the numbers up, and

1 maybe some desired outcome of X number of minorities in
2 each of these districts might meet some particular
3 criteria and didn't feel it fair, at our expense, to do
4 that.

5 Q. Do you know if that was actually done?

6 A. I don't.

7 Q. For District 2 -- have you looked at any of the
8 statistics that compare plaintiffs' plans with the 2023
9 enacted plan?

10 A. You mean with -- for race and ethnic or racial
11 mix?

12 Q. Yes, ma'am.

13 A. I only looked at them. I didn't spend any time
14 really on them.

15 Q. Do you have any understanding as it relates to
16 District 2 whether plaintiffs' plans have a higher or
17 lower white voting-age population in District 2 than the
18 2023 enacted plan?

19 A. I didn't. In all honesty, I really didn't look
20 at it that way. We were focused on keeping communities
21 together.

22 Q. When you say, "We were focused on keeping
23 communities together," to be clear, you didn't draw the
24 map?

25 A. No. No. We didn't draw it.

1 Q. And nobody from the South Dade NAACP drew the
2 map, did they?

3 A. No.

4 Q. In paragraph 9, you say that "The racial
5 gerrymander of the recently enacted city commission map
6 unfairly classifies Miami residents and GRACE members on
7 the basis of race."

8 First, let me ask -- and I don't mean it to be
9 a silly question. Is there a fair way to classify
10 people on the basis of race?

11 A. I don't know. Possibly. Possibly.

12 Q. All right. For your statement, what was unfair
13 about the way the city commission drew the city
14 districts?

15 A. I felt per my discussion -- am I talking for
16 NAACP or am I talking about GRACE?

17 Q. For that particular question, I'm just asking
18 you.

19 A. Oh, just asking me?

20 Q. Yes, ma'am.

21 A. I just felt that there were certainly some
22 natural lines and breaks within the city that kept more
23 communities together and could keep communities
24 together. So that was the question we were asking. We
25 didn't have the answer when we started the questions,

1 but we said, "Is there a possibility that you can do
2 that?"

3 Q. In any of your discussions about the map,
4 either on behalf of the South Dade NAACP or involving
5 GRACE, was there any discussion about orienting or
6 trying to change the political makeup of the commission?

7 A. Change the political makeup? I'm not exactly
8 sure what you're asking me.

9 Q. Would you agree that the three Hispanic
10 commissioners tend to identify as conservative-leaning
11 in their politics?

12 A. As being conservative in their politics?

13 Q. Yes, ma'am.

14 A. They often vote together on issues.

15 Q. Okay. Are they often at odds with the
16 commissioner from District 2?

17 A. More likely than not.

18 Q. And that would have been true of both
19 Commissioner Russell as well as true for Commissioner
20 Covo; correct?

21 A. She's new.

22 Q. Has it also been a trend that carried on with
23 Commissioner Covo?

24 A. Yes.

25 Q. So I guess, again, in that vein, was there any

1 discussion about drawing the maps in a way that might
2 result in different Hispanic commissioners?

3 A. We didn't discuss drawing it to get a different
4 Hispanic commissioner.

5 Q. Are you aware of other entities or
6 organizations that discussed that?

7 A. Not -- not with me there. I can't say what
8 they discussed when I wasn't there.

9 Q. Sure.

10 A. But, no, not -- not with me present.

11 Q. Okay. Did you hear secondhand of those
12 conversations going on?

13 A. To get different Hispanic commissioners?

14 Q. Yes.

15 A. Okay. Not different Hispanic commissioners.
16 Just different commissioners.

17 Q. Different commissioners -- the way the
18 districts are drawn, pretty good chance it might be a
19 Hispanic but a different commissioner. In other words,
20 not be incumbent?

21 A. Oh, yes. That discussion is had all the time.

22 Q. Okay. Was that one of the motivating purposes
23 behind significantly reorganizing the Hispanic
24 districts?

25 A. Not for -- not for GRACE or the NAACP.

1 Q. Okay. Are you aware of whether it was a
2 motivating purpose for any of the other plaintiffs?

3 A. I -- I don't know.

4 Q. Okay. Have you ever heard of anybody
5 affiliated with this litigation articulating that?

6 A. Not specific. Not -- not specific. Other than
7 new commissioners.

8 Q. Okay. So there was -- there was an expression
9 that they would like maps that would elect new
10 commissioners, different commissioners; is that fair?

11 A. That's fair.

12 Q. And where did those expressions come from?

13 A. I -- I didn't, like, you know, take names and
14 numbers. It's just people made the comment, you know.
15 And if you're there, you know, it's -- everybody has an
16 opinion.

17 Q. That, they definitely do.

18 (Defendant's Exhibit Number 24-35, Declaration
19 of Harold Ford, was marked for Identification.)

20 BY MR. LEVESQUE:

21 Q. Ms. Donaldson, I am going to show you what
22 we're going to mark as Defendant's Exhibit 24-35.

23 MR. MERKEN: Thank you.

24 BY MR. LEVESQUE:

25 Q. Before we mark that, if you could just look at

1 this real quick.

2 Ms. Donaldson, have you seen this document
3 before?

4 A. Yes.

5 Q. And it's my understanding that this is the
6 declaration of Harold Ford on -- as president of the
7 South Dade branch of the NAACP. Is my understanding of
8 that correct?

9 A. Yes, that's correct.

10 Q. Now, on behalf of the NAACP, one of the issues
11 that Mr. Ford identified in paragraph 8 was that the
12 commission map makes it harder for the South Dade NAACP
13 itself to advocate before the city commission. And the
14 example that he provided was that organizing in a
15 specific neighborhood, for example, may require
16 interfacing with several commissioners whose districts
17 cut across those neighborhoods; not just Coconut Grove
18 but also Flagami, Little Havana, and others.

19 Now, we looked at the historical maps, and
20 Flagami has always been split between District 1 and
21 Districts -- District 4. Would you agree with that?

22 A. I think that's what we saw, yes.

23 Q. And, again, you're not aware of anybody
24 articulating to the South Dade NAACP that that was a
25 challenge for the folks in Flagami?

1 A. No, not to my knowledge.

2 Q. Okay. Would you agree that sometimes some
3 commissioners are just generally more -- more responsive
4 to their constituents than other commissioners?

5 A. That's been my observation, yes.

6 Q. And sometimes that might be less because of who
7 elected them but more because of just who the
8 commissioner is as a person. Would you agree with that?

9 A. That's possible.

10 Q. So it would also be possible that if Coconut
11 Grove was split between three commissioners and all the
12 commissioners cared about them, they could be very well
13 taken care of. Wouldn't you agree?

14 A. Unlikely.

15 Q. But it's possible?

16 A. Slightly possible.

17 Q. Okay. Are you aware of any research or
18 economic studies that would support the idea that those
19 types of arrangements make it less possible versus more
20 possible?

21 A. I'm not aware of any.

22 Q. Did the issues that are being faced by the
23 folks in the West Grove, are those issues the same type
24 of issues that people in the North Grove are battling
25 with?

1 A. Some. Not all.

2 Q. Okay. What are some of the issues that are the
3 same?

4 A. Overdevelopment --

5 Q. Okay.

6 A. -- is an issue for everybody. The eclectic
7 nature of the community is an issue for us all. We're
8 losing that uniqueness about The Grove.

9 Q. What are other areas that are the same?

10 A. Financially, they definitely are not the same.
11 Not the same.

12 Q. We'll get to the "not the same." So let's just
13 stay on the ones that are the same.

14 A. Okay. Let's see. Traffic is overbearing
15 throughout The Grove. We're looking for the ones that
16 are the same?

17 Q. Yes, ma'am.

18 A. Those are three that come to mind. Traffic,
19 overdevelopment.

20 Q. Well, let me ask you about those three that
21 you've identified so far.

22 Overdevelopment, is that something that's
23 unique to just the folks in Coconut Grove, or is that a
24 broader problem that the entirety of the city of Miami's
25 probably experiencing?

1 A. It's a broader problem. It's just that when
2 you have a small area, it exacerbates the issue.

3 Q. And are there other areas of Miami that are
4 also struggling to maintain the eclectic nature of their
5 individual neighborhood?

6 A. There are other communities that are suffering
7 with gentrification. I -- I don't know of any of the
8 others that have -- would be close in the lifestyle
9 within The Grove.

10 Q. And that's the nature of being a unique and
11 eclectic area?

12 A. Right. Right. Yeah. So I -- none -- none are
13 coming to mind, really.

14 Q. And I'm not suggesting that they are exactly
15 like The Grove just 20 miles north of here or something
16 like that.

17 A. Right. Right.

18 Q. Even the ones that are north of here, like the
19 Design District, have their own character --

20 A. Have their -- Design District has their own
21 character. Morningside has its own character. I mean,
22 Biscayne has just become high-rises and stuff, so, you
23 know --

24 Q. Which --

25 A. It has no character.

1 Q. Which -- well, I was going to say which is its
2 own character --

3 A. The character.

4 Q. -- but no character --

5 A. So it just depends.

6 Q. And lots of areas in the city of Miami have
7 traffic problems too, don't they?

8 A. Yes.

9 Q. Now, some of the areas that you identified that
10 were -- that were different, one was financially, you
11 mentioned.

12 What do you mean by that?

13 A. You have extremely wealthy folks in The Grove
14 and extremely poor in The Grove. Housing, you have
15 enormous mansions on one side, and you have shacks on
16 the other.

17 Let's see. What are some other things? You
18 have development -- positive development on one side,
19 and you have degrading structures and slumlord areas on
20 another side.

21 Q. And just so we're clear, those wealthier areas
22 that you're talking about, those aren't in the West
23 Grove, are they?

24 A. Well, that's some of the changing dynamics. So
25 you have a dynamic where some of the wealthy have

1 decided that it's attractive to gentrify the West Grove
2 because, you know, West Grove is high land, so it's
3 addressing those individuals that can't any longer be on
4 the water, and at five stories, you get Bayview and
5 Ocean View if you're in the West Grove.

6 Q. Uh-huh.

7 A. And most of our buildings are no higher than
8 three stories.

9 Q. Uh-huh.

10 A. So guess what? Condemn them and tear them
11 down, and that's what developers are trying to find
12 every reason to get around the system to do that, which
13 is part of the reason it was -- we've named it a
14 historic district --

15 Q. Uh-huh.

16 A. -- historic corridor, put in an NCD 2, a CRA
17 that I talked about. So lots -- lots of things are --
18 happen to protect that. It's the oldest community in
19 the city of Miami. Older than the city of Miami.

20 Q. But that sounds from your description and what
21 you see happening that not everybody on the north side
22 is agreeing with what you want to accomplish in terms of
23 preserving the West Grove.

24 Did I understand that correctly?

25 A. Not everyone. But more locals think more

1 similar than dissimilar. But that doesn't change how a
2 developer views it. And a developer is not necessarily
3 who we would consider family.

4 Q. Is it possible that there might be people in
5 the North Grove that might consider the developer
6 family?

7 A. Oh, absolutely.

8 Q. Okay.

9 A. Oh, yeah. There's always a snake in the grass.

10 Q. I don't know if I would say that.

11 A. I call it the way I see it.

12 MR. LEVESQUE: Ms. Donaldson, I don't think I
13 have any more questions at this time.

14 THE WITNESS: Okay.

15 MR. LEVESQUE: Your counsel may.

16 MR. MERKEN: May we take five minutes to --

17 MR. LEVESQUE: Yes, we may.

18 MR. MERKEN: Thank you.

19 (Thereupon, a recess was taken in the
20 deposition, after which the deposition continued as
21 follows:)

22 CROSS-EXAMINATION

23 BY MR. MERKEN:

24 Q. Ms. Donaldson, earlier you testified that you
25 never presented the 2023 city map to the South Dade

1 NAACP branch.

2 Do you remember that?

3 A. Yes.

4 Q. Why did you make that decision?

5 A. Because at that point, it had already gone to a
6 higher court, and so I did not see the need for doing
7 any more in-depth discussion with the board as it
8 relates to it because that's the map that was going to
9 be used. It's a very short window for Miami. They're
10 on off-years for their election, and we went immediately
11 into identifying candidates and folks that were going to
12 be moving in for the election that will take place in
13 November. Less than three weeks now.

14 Q. Was there any overlapping harm between the 2023
15 map and the 2022 map that you identified?

16 A. Overlapping harm?

17 Q. Caused by the two maps.

18 A. Well, in the 2023 map, more of District 2 has
19 been carved out to be a part of District 3 of this
20 upcoming election.

21 Q. I want to ask you about the two declarations we
22 discussed. The first is your declaration, which is
23 Exhibit 24-33.

24 Do you have that declaration?

25 A. Let me see. 24-33, yes.

1 Q. On whose behalf is that declaration made?

2 A. GRACE.

3 Q. And then I want to ask you about the
4 declaration of Harold Ford, which is Document -- excuse
5 me -- Exhibit 24-35.

6 Do you have that exhibit?

7 A. Yes.

8 Q. And on whose behalf was that declaration made?

9 A. South Dade NAACP.

10 Q. Do you remember Mr. Levesque asking you some
11 questions about your declaration, Exhibit 24-33?

12 A. Yes.

13 Q. The testimony that you gave in that declaration
14 and your statement today about that, who -- on whose
15 behalf would those -- strike that.

16 To whom would those statements be attributed?

17 A. You mean me speaking to GRACE?

18 Q. It's a bad question. I apologize.

19 The testimony that you gave today regarding
20 your declaration --

21 A. Yes.

22 Q. -- to whom would that testimony be attributed?

23 A. To me.

24 Q. And was Mr. Ford's declaration the only
25 declaration submitted on behalf of the South Dade NAACP?

1 A. Harold Ford?

2 Q. Yes.

3 That was the only declaration submitted on
4 behalf of the NAACP?

5 A. That's correct.

6 Q. On behalf of the South Dade branch of the
7 NAACP?

8 A. South Dade branch, yes.

9 Q. Just briefly turning back to the two maps, the
10 2023 and 2022 maps. How similar do you believe those
11 two maps are?

12 A. They are -- they're similar.

13 MR. MERKEN: I have nothing further. Thank
14 you.

15 REDIRECT EXAMINATION

16 BY MR. LEVESQUE:

17 Q. Ms. Donaldson, I've just got a few follow-ups.

18 You were asked about your personal opinion as
19 to whether in the 2023 map -- I believe you indicated
20 that more of District 2 was carved into or put into
21 District 3; is that correct?

22 A. Yes.

23 Q. That's your personal opinion; correct?

24 A. Well, as I look at the two maps, it appears
25 that way to me.

1 Q. Right.

2 But that's not the opinion of the South Dade
3 NAACP. They've -- they've never taken the position --
4 you've never presented the 2023 map to the board, have
5 you?

6 MR. MERKEN: Objection. Form.

7 BY MR. LEVESQUE:

8 Q. I'll withdraw the question. I'll rephrase.

9 You testified earlier that you never shared the
10 2023 map with the South Dade NAACP; correct?

11 A. Correct.

12 Q. And you also testified, because of that, you're
13 not able to say what their objections are; correct?

14 A. Correct.

15 Q. In your declaration, you identified yourself as
16 being a member of GRACE; correct?

17 A. Yes.

18 Q. And you yourself are not a resident of the
19 city; correct?

20 A. That's correct.

21 MR. LEVESQUE: No further questions.

22 MR. MERKEN: We're good.

23 MR. LEVESQUE: Okay.

24 (Thereupon, the deposition was concluded at

25 4:30 p.m.)

CERTIFICATE OF OATH

STATE OF FLORIDA:

COUNTY OF MIAMI-DADE:

I, VANESSA OBAS, RPR, Notary Public, State of Florida, do hereby certify that CAROLYN DELORES DONALDSON personally appeared before me on October 9, 2023 and was duly sworn and produced her driver's license as identification.

Signed this 23rd day of October, 2023.



VANESSA OBAS, RPR

Notary Public, State of Florida

My Commission No.: HH 428338

Expires: September 13, 2027

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CERTIFICATE OF REPORTER

STATE OF FLORIDA:
COUNTY OF MIAMI-DADE:

I, VANESSA OBAS, RPR, Notary Public, State of Florida, certify that I was authorized to and did stenographically report the deposition of CAROLYN DELORES DONALDSON; that a review of the transcript was requested; and that the foregoing transcript, pages 5 through 102, is a true and accurate record of my stenographic notes.

I further certify that I am not a relative, employee, or attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

DATED this 23rd day of October, 2023.



VANESSA OBAS, RPR

ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT-ENTER CHANGES HERE

IN RE: GRACE, INC., et al. v. CITY OF MIAMI

CASE NO: 1:22-cv-24066-KMM

DATE: October 9, 2023

DEPONENT: CAROLYN DELORES DONALDSON

PAGE NO.	LINE NO.	CORRECTION & REASON
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Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true."

DATE

CAROLYN DELORES DONALDSON

1 October 26, 2023
2 CAROLYN DELORES DONALDSON
C/o DECHERT LLP
3 929 Arch Street
Philadelphia, Pennsylvania 19104
4 christopher.merken@dechert.com
5 In Re: October 9, 2023, Deposition of CAROLYN DELORES
DONALDSON

6 Dear CAROLYN DELORES DONALDSON:

7 The above-referenced transcript is available for review.

8 You should read the testimony to verify its accuracy.
9 If there are any changes, you should note those with the
reason on the attached Errata Sheet.

10 You should, please, date and sign the Errata Sheet and
11 e-mail to the deposing attorney as well as to Veritext
at transcripts-fl@veritext.com and copies will be
12 emailed to all ordering parties.

13 It is suggested that the completed errata be returned 30
14 days from receipt of testimony, as considered reasonable
under Federal rules*, however, there is no Florida
statute to this regard.

15 If the witness fails to do so, the transcript may be
16 used as if signed.

17 Yours,
18 Veritext Legal Solutions
19
20

21 Waiver:

22 I, _____, hereby waive the reading and signing
of my deposition transcript.

23
24 _____
Deponent Signature Date
25 *Federal Civil Procedure Rule 30(e)/Florida Civil
Procedure Rule 1.310(e)

[& - 3rd]

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FLORIDA RULES OF CIVIL PROCEDURE

Rule 1.310

(e) Witness Review. If the testimony is transcribed, the transcript shall be furnished to the witness for examination and shall be read to or by the witness unless the examination and reading are waived by the witness and by the parties. Any changes in form or substance that the witness wants to make shall be listed in writing by the officer with a statement of the reasons given by the witness for making the changes. The changes shall be attached to the transcript. It shall then be signed by the witness unless the parties waived the signing or the witness is ill, cannot be found, or refuses to sign. If the transcript is not signed by the witness within a reasonable time after it is furnished to the witness, the officer shall sign the transcript and state on the transcript the waiver, illness, absence of the witness, or refusal to sign with any reasons given therefor. The deposition may then be used as fully as though signed unless the court holds that the reasons given for the refusal to sign require rejection of

the deposition wholly or partly, on motion under rule 1.330(d)(4).

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VERITEXT LEGAL SOLUTIONS

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Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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